## COMMUNITY SERVICES BLOCK GRANT (CSBG)

## **Field Review Instrument**

Age	ncy l	Nam	e: CSI	CSD Specialist:				
Add	lress	:	Titl	e:				
Tele	ephoi	ne:						
Boa	rd C	hair	person: Dat	Date of Notice:				
Exe	Executive Director: Date of Visit:							
This instrument is to be used by the CSD specialists to review activities and records pertaining to the eligible entities that are sub-grantees or contractors of the funds provided through the Community Services Division of ADECA. This document is to be completed on each sub-grantee annually. Questions requiring a lengthy explanation should be addressed on plain bond paper at the end of Section IX referencing the Section No. and Question No.								
			Section I: E	ligibilit 	<b>y</b>		Г	
				YES	NO	N/A	Notes/References	
In accordance with the CSBG Reauthorization of 1998, Sec. 673 (1), Sec. 676B of the State Plan is the subgrantee an eligible entity? If NO, Explain why.								
			Are the following documents or	file and	l readi	ly availa	able?	
A.	Arti	icles	of Incorporation					
	1.	off	the Articles of Incorporation contain the icial address (Code of Alabama 10A-1-5.32) I purpose (Code of Alabama 10A-3-1.04) of non-profit organization? If no, explain.					
2. Have the Articles of Incorporation and changes been filed with the Secretary of State (Code of Alabama 10A-3-4.04) or the County Probate Judge?								
B.							umber 2 (Revision 3))	
	1.		nen were the By-laws last revised?					
	2.	Do	the By-Laws contain					
		a.	Size and composition of the board?					
		b.	Is the board composition defined in the Bylaws in accordance with Sec. 676B of the CSBG Reauthorization of 1998?					

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C.	Does it comply with the Alabama Code Section 11-96-1 through 6? Are Public Sector members appointed by the CEO of the jurisdiction each represents? Is there supporting documentation?			
d.	Do the By-Laws describe who representatives of the poor will be selected by? Is there supporting documentation for each member?			
e.	Do they describe who representatives of the private sector will be selected by? Is there supporting documentation? (Alabama CSBG Community Action Agencies Policy Letter Number 2 (Revision 3) requires each representative be empowered to speak and act on behalf of the organization which he/she represents regarding the business of the board)			
f.	Do the By-Laws define types of committees? (Alabama CSBG Community Action Agencies Policy Letter Number 2 (Revision 3)			
g.	Have the selection procedures for the Board membership been reviewed by each County Commission within the service area? (Code of Alabama 11-96-3)			
h.	Do the By-Laws define the following: (Alabama CSBG Community Action Agencies Policy Letter Number 2 (Revision 3) unless otherwise cited)			
	I. Schedules of routine and annual meetings? Notices to both the members and the public?			
	II. Removal of members?			
	III. Board vacancies?		Ц.	
	IV. Are there alternates? If so, they need to be eliminated.			
	V. Quorums? (more than 50% of the Board membership regardless of vacancies)			
	VI. Control of minutes of the Board?			
	VII. Compensation of board members for expenses to attend meetings?			
	VIII. Residence requirements of board members?			
	IX. Conflict of interest?			
	X. Dissolution of the Board? (Alabama Nonprofit Act 10A-3-7.01 thru 7.18)			
	XI. Term limits? If not, then term limits are for one year as stated in the Alabama Nonprofit Act.			

							<del>-</del>					
	3.	* *	of the By-Laws been given to each per? (Best Practice)									
	4.		Laws overall describe the decision	+								
	4.	making process and distribution of authority										
			organization?									
C.	Roa		nip- (Review Board Roster)									
С.												
	1.					greater	than 51) (Alabama CSBG					
			Action Agencies Policy Letter Number	Z (Revisi	on 3))							
			e the composition of the Board.									
		I.	Total Members									
		II.	Elected Official(s)									
		III.	Representation of the poor									
		IV.	Private sector									
		V.	# Vacancies (How long?)									
			(Refer to by-laws for compliance)									
	2.	Does the c	omposition of the board fairly									
		represent t	he service area of the subgrantee?									
	3.	Is emphasi	s placed on selection of									
		representat	tives of the poor?									
D.	Boa	rd Minutes/N										
	1.		oard meet in accordance with its									
			(Agencies by-laws, must be at least									
			year with a quorum (Alabama									
			munity Action Agencies Policy Letter									
		Number 2 (	Revision 3))									
l	2	A no boond	members aware of the board's				Т					
	2.					Ш						
	3.		lity? (CSBG Act, Section 676B)									
	3.		attendance rosters part of the Alabama CSBG Community Action									
			olicy Letter Number 2 (Revision 3))									
	4.		ninutes identify Motions and									
	٦.		the Motions? (Alabama CSBG									
			Action Agencies Policy Letter									
			Revision 3))									
	5.		are not unanimous is there a record	П								
		of each me	embers vote? (Alabama CSBG									
		Community	Action Agencies Policy Letter									
			Revision 3))									
	6.		s of the minutes signed by the									
			nd the chairperson? (Rules									
			r Best Practice)									
	7.		juorum problem?									
	8.		gency maintain a permanent record									
			ent/past board minutes? (Alabama									
		Nonprofit	•									
	9.		da for the next board meeting and									
			s of the previous meeting mailed to									
			per prior to such meetings as stated									
			Laws; or in a timely manner to									
			rd members access prior to the next									
		scheduled	meeting? (Best Practice)									

		1 ES	NU	IN/A	NOTES/KEFEKENCES
	Section III: PROGRAM A	YES	ISTR NO	ATION N/A	NOTES/REFERENCES
	(b)(9))	DATE	TOWN	ATTON	
	goals and objectives? (CSBG Act, Section 676,				
	private organizations on behalf of the agency's				
	commissions, public organizations, unions, and				
	churches, other non-profit organizations,				
	members coordinate activities and advocate to				
2.	Do the Executive Director and the board				
	resulted from the advocacy?				
	676B (a)(1)) What programs or donations have				
1.	goals and objectives? (CSBG Act, Section				
1.	Do board members advocate for the agency's	$\vdash \vdash \vdash$	$\vdash$		
Puh	lic Relations	$\vdash \sqcap$	$\vdash \sqcap$		
	appointments? (CSBG Act, Section 672)				
	planning process and Board Committee				
/ .	participation of the poor" concept in its				
6. 7.	Does the agency utilize "the maximum feasible	<del>                                     </del>	$\vdash \vdash \vdash$	ᅡ井ᆉ	
6	Does the agency have a long-range plan?				
	Describe				
<i>J</i> .	(Best Practice)				
5.	Are needs within the service area prioritized?	$\Box$			
	developer? (Best Practice)				
4.	Does the agency have a program/project	$\vdash \sqcap$			
	Act Section 676, 11)				
	the community and/or service area? (CSBG				
	is focusing on the most acute problems within				
] 3.	at least every 2 years to ensure that the agency				
3.	Is the needs assessment perpetual or conducted				
	DATE				
2.	subgrantee. (CSBG Act Section 676, 11)				
2.	Provide date of last Needs Assessment by the				
	Board is responsible for planning)				
1.	committee? (Best Practice – CSBG Act states				
1.	Does the board have an active planning				
Dlar	ning	<u> </u>	<u> </u>		1 (Olds) Acter chees
		YES	NO	N/A	Notes/References
	Section II: BUAKD/AGENC	1 AUN	111/12	1 KA HU	VIN
	committee meetings).  Section II: BOARD/AGENC	VADA	 	TD A TIC	N.
	(This includes By-Laws, roster, board and				
12.					
12	notices, votes etc.? (Open Meetings Act)  Is all Board information current in FACSPro?			+ $ +$	
	committee meetings with respect to quorums,				
11.	Have the same criteria been applied to all	Ш			
1.1	the general public? (Open Meetings Act)			+ -	
	accordance with agency policy and open to				
10.	Are routine board meetings announced in				

1. Does the agency provide a range of se and activities having a measurable and	vices
and activities having a measurable and	
and activities having a measurable and	
potentially major impact on causes of	overty
in the community or those areas of the	
community where poverty is a particu	orly
acute problem? (CSBG Act, Section 6	
this be verified through the budget, cl	
documentation or information distribu	ed at the
service centers? Record verification	
documentation.	
2. If not all, which of the activities below	does the
agency provide to assist low-income	
participants including homeless indivi	uals and
families, migrants, and the elderly poo	
(CSBG Act, Section 676) Review the	
	s report
as a guide.	
Please Describe	
a. To secure and retain meaningful	
employment	
b. To attain an adequate education	
c. To make better use of available i	come
d. To obtain and maintain adequate	
environment	
	accords
e. To obtain emergency assistance	
loans or grants to meet immediat	
individual and family needs, incl	
need for health services, nutrition	food,
housing, and employment related	
assistance	
f. To remove obstacles and solve p	oblems
which block the achievement of	
sufficiency	
	tho
affairs of the community	
h. To make more effective use of o	
programs related to the purpose	the
CSBG Act.	
3. Does the subgrantee provide on an em	rgency
basis for the provision of such supplie	
services, nutrition's foodstuffs, and re	
services, as may be necessary to coun	
conditions? (CSBG Act, Section 676)	
this service funded? Is it solely throu	
referrals?	
4. Does the subgrantee encourage the us	
entities in the private sector of the cor	munity
in efforts to ameliorate poverty in the	
community? (CSBG Act, Section 676	How?
a Identify local complete massived and	
a. Identify local services received and	
a. Identify local services received and volunteer resources in term of hour week. (required on IS report)	per

		YES	NO	N/A	NOTES/REFERENCES
5.	Is the subgrantee aware that they are prohibited from providing voters or prospective voters with transportation to voting polls or provide similar assistance in connection with an election or any voter registration activity? (CSBG Act Section 678F (b)(2)(B)				
6.	Does the service delivery system employed by the subgrantee target the needs of low-income individuals and families in the service area? (CSBG Act Section 676) Explain.				
7.	Does the subgrantee utilize funding to develop linkages to fill identified gaps in services through information referrals, case management, and follow up on these activities? (CSBG Act Section 676) Explain.				
8.	Does the subgrantee effectively utilize funding to coordinate activities with other public and private resources? (CSBG Act Section 676) How?				
9.	Does the board evaluate the agency programs through self-evaluation? (CSBG Act Section 676B) What were the results or recommendations of the most recent review?				

		YES	NO	N/A	NOTES/REFERENCES
10.	Define the agency outreach capability. This includes public relations, service centers, calls on the home bound, etc. Give specific examples.				
11.	Are services accessible to all low-income citizens including the disabled and/or handicapped in compliance with the American Disabilities Act? (45 CFR Part 84) (Visit outreach site).  Location of site visited				
12.	Does the subgrantee have a non-discrimination policy relating to clients? (45 CFR Part 80)				
13	Are non-discrimination policies followed in providing services to the low income individual or family? To verify, review services provided against applicants.				
14.	Does the subgrantee maintain a priority list of long range problems and address these priorities within funding limitations of the agency? (CSBG Act, Section 676)				
15.	Are the remaining non-funded problems presented to the board in order that they may determine ways and means of providing revenue and resources in an effort to address these conditions?				
16.	Does the agency have a policy in place for referrals for child support? (CSBG Act, Section 678(g))				
17.	Does the agency have a policy in place for referrals to local Career Centers for employment and training opportunities? (CSBG Act, Section 676)				
B.	FACSPRO				
1.	Are all Customers served with CSBG funds at or below 125% of poverty level? Verify by running FACSPro report and checking files of customers on report.				
2.	Are all programs set up in the FACSPro system?				
3.	Are clients correctly entered in the FACSPro system and enrolled into program(s)?				

1 1	4	W 1 1 1 1 0 0				
	4.	Was income recorded accurately? <b>Compare</b>				
		files with FACSPro information. View				
		income history to determine if there have				
		been changes since services were rendered.				
		Pull reasonable sample.				
	5.	Is household size recorded accurately? <i>Pull</i>				
		reasonable sample.				
	6.	Are Action Plans completed in FADSPro?				
	0.	•		╽╙		
		Under each action plan there must be at				
		least one intervention that is completed. This				
		includes the Actual Completion Date and				
		Employee.				
		Section IV: PER	SONN	EL	T	
			YES	NO		
			ILS	NU	N/A	Notes/References
	1.	Does the agency have a functional				
		organizational chart? (Best Practice)				
	2.	Do program/project supervisors and staff know				
		to whom they are responsible?				
	3.	Does each employee's personnel file contain a	П			
		written job description? (DOL website				
		http://www.dol.gov/compliance/guide/discrim.				
		htm#who)				
	4.	,				
	4.	For employee hired after 1988, does the agency		ΙШ	Ш	
		maintain the appropriate immigration				
		certification (I9) and/or statement of checks for				
		Social Security?( Immigration Reform and				
		Control Act of 1986)				
	5.	Are copies of the Policy/Procedures Manual				
		issued or made available to all employees?				
	6.	Is the Policy/Procedures Manual available to				
		the board members?				
	7.	Does the manual address time and attendance				
		reports? Does it stipulate who should sign the				
		reports?				
	8.	Does the Policy and Procedures manual				
	0.	contain grievance procedures and address non-				
		discrimination assurances for the staff? (CFR				
		45 Part 2540.230)				
	0		$\vdash$			
	9.	Does the subgrantee have a designated equal	ΙШ			
		opportunity officer, if not who is responsible				
		for EO issues? (US Equal Employment				
		Opportunity Commission)				
	10.	Does the subgrantee have a NO SMOKING				
		policy established in accordance with Public				
		Law 103-227 Part C?	L			
	11.	Do the policies and procedures address wage				
		scales?	_			

12.	Do they address travel? Do they indicate				
	approval requirements as well as allowances				
	and processes?				
3	Are the personnel policies and procedures				
	consistent with the fiscal policies with respect				
	to time and attendance reports and travel				
	policies?				
4.	Do the policies address leave procedures?				
5.	Does the agency adhere to its policies and				
	procedures?				
	Section V: PRO	)PERT	'Y		
		YES	NO	NT/A	N. 4 170 0
		ILS		N/A	Notes/References
•	Does the agency have on file an ADECA		$  \sqcup  $		
	Recipient Property Management Manual?				
•	Has any equipment been purchased with any				
	CSBG funds from program year being				
	monitored? Have PMU1 forms been sent to				
	CSBG unit? Check expenditure back-up form				
	from last invoice submitted.				
	Do the property records accurately reflect the				
	equipment on hand? All equipment valued at				
	\$500.00 or more must be included in the				
	inventory if purchased with funds from				
	ADECA. (\$5,000 or more will be on report				
	from Accounting, \$500 and below on file in				
	our department) (ADECA Recipient Property				
	Management Manual) Compare agency's				
	listings to those from ADECA for that agency.				
	How frequently does the agency inventory equipment? Must be annually as a minimum.		╽╙		
	Does the agency have a designated property				
	officer? Name		╵╜		
	Does the agency purchase, maintain, and		$\vdash \sqcap$		
	dispose of non-consumable property purchased		╵╜		
	with Federal-State funds in accordance with				
	ADECA policy? (ADECA Recipient Property				
	Management Manual)				
					1
	Section VI: FISCAL RI	ESPON	SIBII	ATY	
		YES	NO	N/A	Notes/References
,	Does the agency have a current fidelity bond				
	that provides adequate coverage as required by				
	OMB Circular A-110 Subpart C § 21 d				
	(determined by the amount of the smallest				
	grant administered by ADECA awarded to the				
	agency)? What is the amount?				
	What percentage of funding is the current bond				
	amount?				

2.	Is the number of employees in the accounting section adequate? <b>Review Documentation</b>				
3.	Is there a separation of duties/responsibilities within the accounting section? (GAAP)				
4.	When were the agency's records last audited?				
	a. Were there findings?	Ħ	Ħ	H	
	b. Were there repeat findings?	Ħ	İΠ	H	
	c. Were the findings resolved?	H	Ħ		
	c. Were the imangs resorved.	YES	NO	N/A	NOTES/REFERENCES
5.	Does the Agency have written procurement procedures as required by (OMB Circular A-110)? Compare the criteria with selected bid documents and an RFP.				
6.	Does the agency pre-certify funds available on purchase orders? <b>How?</b>				
7.	Does the agency comply with the requirements of the State Bid Law on purchases of \$15,000 and greater? Are quotes obtained so that the agency has complied with the federal regulations as well with to the maximum extent practical, open and free competition was achieved?				
8.	Are quotes obtained so that the agency has complied with the federal regulations as well as with to the maximum extent practical, open and free competition was achieved? (OMB Circular A-110)?				
9.	Does the agency prepare a Request for proposals (RFP) for professional services, i.e., auditor? Was supporting documentation provided to substantiate the selection made? Notations should be made specific to the RFP that was reviewed.				
10.	Is the selected contractor on either the State or Federal debarment or suspension list as required by OMB Circular A-110, Subpart C-\\$13? Can this be verified by a print out from the federal website for federal and by a documented conversation with ADECA legal staff for state? (Agency should have evidence that all contractors, vendors, employees, should be verified on epls.gov)				

		11.	of S prod or i con that othe buil	the agency complied with the requirements section 678 (F) of the CSBG Act which hibits use of CSBG Funds for the purchase improvement of land, or the purchase, struction, or permanent improvement (other in low-cost residential weatherization, or er energy-related home repairs) of any ding or other facility except as provided for section 678F (a)(1) of the CSBG Act?				
	Sta	ndard		Section VII OMB Cire Grantee Financial Management System:	cular A	A – 12	2.	
					YES	NO	N/A	Notes/References
	A.		the ide fo	grantee's financial management system				
		1.	Rec of f	ords to identify the source and application unds as required by OMB Circular A-110, part C §21 b2:				
			a.	Is there a cash receipts journal? Pull selected items to determine if they were properly posted. Are cash transactions posted in the correct amounts? Were they all CSBG? Were there any refunds? If so, Why? If a refund is for a duplicate payment this is an indication that internal controls have failed and further work in this area is warranted.				
F					YES	NO	N/A	NOTES/REFERENCES
			b.	Is there a cash disbursement journal? Select several items, a representative sample for agency size for testing. Does each transaction have proper approval? Was the correct purchase order process followed? Was each one paid in a timely manner?				
			c.	Is there a general ledger?				
			d.	Are audit trails provided that permit tracing of any transaction back to the original source document and forward to summary records? Track each of the transactions in your sample.				
			e.	What is the total amount of CSBG funds drawn/deposited in the CSBG account?				

	- TE1	00 1 1 1 1 11				
2.		e effective control over and accountability	Ш	$  \sqcup  $		
	for	all funds, property and assets as required by				
	OM	IB Circular A-110 Subpart C § 21 b3:				
	a.	Are there dual signatures on checks? If				
		so, one signature should always be that of				
		a designated Board member. One of the				
		two may be a designated staff person.				
	L					
	b.	Are signature stamps used? If yes, does	ш	$  \; \sqcup \;  $	$\mid \; \sqcup \; \mid$	
		one person have access to both				
		signatures? Strongly discourage the use				
		of signature stamps.				
	c.	Are signature stamps locked up securely?				
	С.	Are signature stamps locked up securely:				
	d.	Are checks numbered consecutively? Are				
		missing checks accounted for? Missing				
		checks can be determined by scanning				
		through bank statements.				
		Are blank checks unsigned? Ask to see				
	e.	E			▎╙ᅦ	
	-	and scan through to verify.				
	f.	Are unused checks kept in a secure area?	Ш	Ш		
		Verify location.				
	g.	Are voided checks defaced? Verify				
		spoiled checks.				
3.	Are	expenditure reports sent to ADECA on a				
٥.		ely basis? Due by 10 <sup>th</sup> of month.				
4.		omparison of budget to actual grant				
٦.		enditures:				
	1					
	a.	Does the Director receive a monthly	ш	$  \; \sqcup \;  $		
		report comparing budgeted costs with				
		actual costs as required by OMB Circular				
		A-110 Subpart C §21 b4? Ask for a copy				
		of the report for the previous month and				
		do the comparison.				
			YES	NO	N/A	NOTES/REFERENCES
5.	Doe	es the grantee report indirect costs? If yes,				
		at is that rate? Obtain a copy of the indirect			-	
		approval from HHS. (OMB Circular A-				
		) If the agency does not have a rate, ask for				
		cost allocation plan. Verify that they are				
		rging and allocating cost in accordance with				
6	_	plan.				
6.		per supporting documentation of			⊔	
		ounting records as required by OMB				
		cular A-122 Attachment A A2.g:				
	a.	Is there prior approval of invoices before	$\sqcup$	$  \sqcup  $	$\mid \; \sqcup \; \mid$	
		payment, as evidenced by initial on				
		invoice? Verify by pulling a				
	L	representative sample.				
	b.	Are invoices coded with grant name and				
		number?				

1					_	
	c.	Do invoices include a description of the	Ш			
		service being performed or the goods				
		purchased, identification of the vendor,				
		the unit price where appropriate, and the				
		total cost to be charged to the CSBG				
		program? All this information should be				
		included. If the cost is allocated it should				
		be in accordance with the plan.				
	d.	Does the system require that personnel				
	u.	costs charged to a grant be based on			Ш	
		written authorization maintained in				
		individual personnel files? For example,				
		a job description should be detailed				
		enough that it is clear which program or				
		source of funds should support that				
		person's time.				
	e.	Are personnel charges supported by time				
		and attendance records? Records must be				
		based on an after the fact determination of				
		actual hours spent on specific tasks as				
		required by OMB Circular A-122				
		Attachment B 8 m2(a). Check Samples.				
	f.	Are contracts in writing? Pull a				
	1.	representative sample and review and				
		note whether or not the agency is aware				
	_	that all contracts must be in writing.  Travel costs should be scrutinized more				
	g.		Ш	ш	Ш	
		than other costs. Are travel costs, if				
		charged to CSBG funds based on:				
		1. Written travel policies?			<u> </u>	
		2. Documentation showing the time,				
		purpose, mode and points of travel,				
		and the expense? Pull samples and				
		verify that there was prior approval,				
		that costs were in accordance with				
		policies and procedures and that the				
		procedures were in compliance with				
		federal requirements.				
7.	Acc	curate, current, and complete disclosure				
		arding each federal grant as required by				
		IB Circular A-110 Subpart C § 21 b1:				
	a.	Expenses charged to period in which it				
	a.	was incurred?		╽╜╽		
	b.	Are bank accounts reconciled monthly?	$\vdash \sqcap$			
	0.	By whom? Scan for missing checks.		╽╙╽		
		•				
		Check that expenditures tested cleared for				
		the amount of check written	<del> </del>			
8.		Is there security for backing up financial		$\mid \sqcup \mid$	Ш	
		documents? Are records backed up at				
	Ļ	least weekly?				
9 <u>Interest</u>	Inco	<u>me</u>				

A.		any interest earned on CSBG funds or program				
		me pending disposition of the income?				
B.		t is the total amount of interest earned on CSBG		Ш		
		s and program incomes cumulatively (If this				
		unt is over \$250, it has to be returned to the state				
	as re	quired by OMB Circular A-110 Subpart C § 22				
10.	1.)					
	etenti	on and Custodial Requirements for Records:				
A.		antee aware that all pertinent records must be				
11.	_	ned at least five years after closeout or the				
		ution of all audit findings as required by OMB				
		ular A-110 Subpart C §53 b?				
B.		dit findings are not resolved in five years,		П		
ъ.		rds must be retained for longer period. Retention				
		od starts when final expenditure report has been				
		nitted, or for non-expandable property, from the				
		of final disposition.				
	aute	or mar disposition.			<u> </u>	
		Section VIII: WORKI	PLAN/I	BUDG	ET	
			YES	NO	N/A	<b>Notes/References</b>
	1.	Does the subgrantee administer its programs as				
		indicated in the work plan? (CSBG Act) Are				
		all programs adequately funded in the budget?				
	2.	Do program supervisors have a copy of the work plan?				
	3.	Has the subgrantee accomplished its stated				
	٥.	goals for the quarter? How was this				
		determined?				
	4.	Does the budget reconcile to the work plan?				
	т.	Boes the budget reconcine to the work plan.				
		Section IX: DATA	COLI	LECT	ION	
			MEG	NO		
			YES	NO	N/A	Notes/References
	1.	Is the agency using the FACSPro software to				
		record client services and demographics?				
		Section X: GENER	AL FI	IINDS		
		Section 24. GENER		01100		
			TITIC	NO		
			YES	NO	N/A	<b>Notes/References</b>
	1			110	IV/A	Notes/References
	1.	In the use of State General Funds, does the				Notes/References
	1.	agency have written standards or guidelines to				Notes/References
	1.	agency have written standards or guidelines to assure funds are used to satisfy client needs?				Notes/References
	1.	agency have written standards or guidelines to				Notes/References

Section XI: ROMA					
		YES	NO	N/A	Notes/References
1.	Has the agency implemented ROMA? (CSBG Act Section 676)				
2.	Is data current?				
3.	Have quarterly ROMA reports been timely and complete?				
4.	Are there any areas on ROMA reports where there is a 20% increase or decrease variance between Projected to Achieve and Achieve Performance numbers? If so, please provide a narrative that shares what aspects contributed to the difference between what was projected and actually achieved.				